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Plaintiffs' Liaison Counsel

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR

MDL No. 3047

This Document Relates to:

*J.F. filed on behalf of minor L.F. v. Meta
Platforms, Inc., et al., 4:23-cv-01846.*

**DECLARATION OF JENNIE LEE
ANDERSON IN SUPPORT OF
PLAINTIFFS' ADMINISTRATIVE
MOTION TO FILE UNDER SEAL
EXHIBIT TO THE DECLARATION OF
JENNIE LEE ANDERSON IN SUPPORT
OF PLAINTIFFS' *EX PARTE*
APPLICATION FOR APPOINTMENT
OF GUARDIAN *AD LITEM***

1 I, Jennie Lee Anderson, do hereby declare and state as follows:

2 1. I am a partner with the law firm of Andrus Anderson LLP. I am duly admitted
3 to practice before the courts of the State of California and in the Northern District of California. I
4 am the Court-appointed Liaison Counsel for Plaintiffs *In re Social Media Adolescent*
5 *Addiction/Personal Injury Products Litigation*, Case No. 4:33-MD-03047, and a counsel of
6 record for the Plaintiff in *Rodriguez v. Meta Platforms, Inc., et al.*, Case No. 4:22-cv-00401. I
7 make this declaration of my own personal knowledge and, if called as a witness, I could and
8 would testify competently to the matters stated below.

9 2. I make this declaration in support of Plaintiffs' Administrative Motion to File
10 Under Seal Exhibit to the Declaration of Jennie Lee Anderson in Support of Plaintiffs' *Ex Parte*
11 Application for Appointment of Guardian *Ad Litem* ("Administrative Motion to Seal").

12 3. For the reasons set forth in Plaintiffs' administrative motion to seal filed on
13 February 28, 2023 (ECF No. 147) and the Administrative Motion to Seal filed herewith, Plaintiffs
14 seek to seal the Exhibit attached to the Declaration of Jennie Lee Anderson in Support of
15 Plaintiffs' *Ex Parte* Application for Appointment of Guardian *Ad Litem* ("Anderson
16 Declaration").

17 4. True and correct copies of the following Exhibit to the Anderson Declaration
18 are as follows and attached hereto:

- 19 • *J.F. filed on behalf of minor L.F. v. Meta Platforms, Inc., et al.*, 4:23-cv-01846
20 (Exhibit 1)

21 5. Pursuant to Civil Local Rule 7-11, I contacted Liaison Counsel for Defendants on June 15,
22 2023, to ask Defendants to stipulate that these documents may be filed under seal. Liaison
23 Counsel confirmed that Defendants will so stipulate, but do not waive, and expressly reserve,
24 their right to seek an order or orders in the future to unseal individual applications and/or require
25 parents who wish to proceed pseudonymously going forward make a showing of good cause.

26 I declare under penalty of perjury pursuant to the laws of the United States of America that
27 the foregoing is true and correct.
28

1 Dated: June 16, 2023

Respectfully submitted,

2 /s/Jennie Lee Anderson
3 Jennie Lee Anderson
4 *Plaintiffs' Liaison Counsel*

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